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DBM:rr

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ALICE JORGENSEN, as Special Representative)	
and as Special Administrator of the Estate of)	
HELEN GORSKI, Deceased,)	
)	
Plaintiff,)	
v.)	Civil Action No. 07 C 6353
)	Magistrate Judge Denlow
SUNRISE SENIOR LIVING, INC., a foreign)	Judge Gottschall
corporation, d/b/a SUNRISE OF SCHAUMBURG,)	
f/k/a SUNRISE ASSISTED LIVING CENTER;)	
SUNRISE SCHAUMBURG ASSISTED LIVING, LLC;)	
SUNRISE SENIOR LIVING MANAGEMENT, INC.,)	
a foreign corporation, f/k/a SUNRISE ASSISTED)	
LIVING MANAGEMENT, INC.; SUNRISE SENIOR)	
LIVING INVESTMENTS, INC., a foreign corporation;)	
ALEXIAN BROTHERS MEDICAL CENTER,)	
individually and d/b/a OLDER ADULT HEALTHCARE;)	
OLDER ADULT HEALTHCARE; SUNRISE THIRD)	
SCHAUMBURG SL, LLC; SUNRISE THIRD (Pool I),)	
LLC; SUNRISE THIRD (Pool II), LLC; SUNRISE)	
THIRD (Pool III), LLC,)	
)	
Defendants.)	

DEFENDANTS' AGREEMENT TO REMAND

NOW COME, the Defendants, SUNRISE SENIOR LIVING, INC., SUNRISE SCHAUMBURG ASSISTED LIVING, LLC, SUNRISE SENIOR LIVING MANAGEMENT, INC., SUNRISE SENIOR LIVING INVESTMENTS, INC., SUNRISE THIRD SCHAUMBURG SL, LLC, SUNRISE THIRD (Pool I), SUNRISE THIRD (Pool II), LLC, and SUNRISE THIRD (Pool III), LLC, by and through their attorneys, PRETZEL & STOUFFER, CHARTERED, and in response to Plaintiff's Motion to Remand, so state the following:

1. These Defendants do not contest Plaintiff's motion to remand. Plaintiff filed this suit in the Cook County Circuit Court on September 7, 2007. Service was affected on the Sunrise entities

on October 9, 2007. Pursuant to 28 USC § 1446(b), Sunrise had 30 days to remove, which put the deadline for removal on November 8, 2007. Sunrise removed this case to federal court on November 8, 2007. Co-defendant, Alexian Brothers Health Center, did not file an appearance until November 21, 2007.

2. At the time of filing Defendants' Notice of Removal, Defendants had a good faith belief that there was complete diversity between the plaintiff and all defendants. Alexian Brothers Health Center is a Texas corporation, and all of the Sunrise entities are foreign corporations. Counsel for Sunrise did not learn until November 30, 2007, that the principal place of business for Alexian Brothers Health Center is in Illinois, and could not have, until Alexian Brothers' attorney appeared in the case. Accordingly, Defendants do not oppose Plaintiff's motion to remand. Plaintiff's attorney has already been informed on Sunrise's position on this matter.

Respectfully submitted,

/s/ Robert E. Sidkey

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Attorney for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the Defendant's Agreement to Remand was filed electronically this 5th day of December, 2007. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic system.

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s/Robert E. Sidkey

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